

Before the
Federal Communications Commission
Washington, D.C. 20554

In the Matter of)	
TelNet Worldwide, Inc.)	
Application Under Section 214)	File No. TC_____
Of the Communication Act of 1934,)	
As Amended, for Global Authority)	
For the Provision of Resold)	
and Facilities-Based)	
International Switched and)	
Private Line Services)	
Between the U.S. and Various)	
International Points.)	
_____)	

APPLICATION

TelNet Worldwide, Inc. (TelNet), by its attorneys and pursuant to § 214 of the Communications Act of 1934, as amended (the Act), 47 USC 214, hereby requests global authority to (1) operate as a facilities-based carrier pursuant to the terms and conditions of § 63.18(e)(1) of the Commission's Rules, 47 CFR 63.18(e)(1), to all foreign points as authorized by the Commission, and (2) operate as a resale carrier pursuant to the terms and conditions of § 63.18(e)(2) of the Commission's Rules to all foreign points as authorized by the Commission, 47 CFR 63.18(e)(2). TelNet has no affiliation with any foreign carrier in any of the destination countries for which it requests authority, nor is TelNet affiliated with any dominant U.S. carrier whose services TelNet may resell. Thus, pursuant to § 63.10(a)(1) of the Commission's Rules, 47 CFR 63.10(a)(1), the

Commission should classify TelNet as a non-dominant carrier in its provision of international service on all routes. Further, as explained herein, this Application is entitled to streamlined processing under § 63.12 of the Commission's Rules, 47 CFR 63.12. According to the FCC's fee schedule, Fee Code CUT, a check in the amount of \$860 is attached hereto.

In support of its request for authority, TelNet submits the following information pursuant to § 63.18 of the Commission's Rules, 47 CFR 63.18.

- a. Applicant's Name, Address, and Telephone Number:

TelNet Worldwide, Inc.
1017 Naughton Dr.
Troy, Michigan 48083
(248) 485-1000

TelNet's Federal Registration Number is 0008-2297-83

- b. TelNet is a corporation organized under the laws of the state of Michigan.
- c. Correspondence concerning this Application should be addressed to:

Gary L. Field
Michael C. Rampe
LOOMIS, EWERT, PARSLEY, DAVIS & GOTTING, P.C.
232 S. Capitol Avenue, Suite 1000
Lansing, Michigan 48933
(517) 482-2400

Mark Iannuzzi, President
TelNet Worldwide, Inc.
1017 Naughton Drive
Troy, Michigan 48083
(248) 485-1000

- d. TelNet has not previously applied for or received § 214 authority from the Commission.

e. TelNet is applying for authority to operate as a facilities-based carrier pursuant to the terms and conditions of § 63.18(e)(1) of the Commission's Rules, 47 CFR 63.18(e)(1), and as a resale carrier pursuant to the terms and conditions of § 63.18(e)(2) of the Commission's Rules, 47 CFR 63.18(e)(2). TelNet requests authority to serve all countries permitted under a grant of global authority. As evidenced by the certification provided in Attachment A, TelNet will comply with the terms and conditions contained in §§ 63.21, 63.22 and 63.23 of the Commission's Rules. 47 CFR 63.21-.23.

f. At this time, TelNet does not seek authority to provide service not referenced under § 63.18(e) of the Commission's Rules, 47 CFR 63.18(e).

g. TelNet will use previously authorized facilities to provide the services requested by this Application. Consequently, TelNet is categorically excluded from environmental assessment pursuant to § 1.1306 of the Commission's Rules, 47 CFR 1.1306.

h. No entity directly or indirectly owns at least 10% equity in TelNet.

i. As evidenced by the certification attached hereto as Attachment A, TelNet is not affiliated with a foreign carrier.

j. As evidenced by the certification attached hereto as Attachment A, TelNet does not seek to provide international telecommunications service to any destination where: (1) TelNet is a foreign carrier in that country; (2) TelNet controls a foreign carrier in that country; (3) any entity that owns more than a 25% interest in TelNet, or controls TelNet, controls a foreign carrier in that country; or (4) two or more parties own, in the aggregate, more than 25% of TelNet and are parties to, or the beneficiaries of, a

contractual relationship that affects the provision or marketing of international basic telecommunications services in the United States.

k. Not Applicable: TelNet is not affiliated or otherwise related to any foreign carrier on any of the routes which TelNet proposed to provide service in this Application.

l. Not Applicable: TelNet is not a foreign carrier and is not affiliated with a foreign carrier on any of the routes it proposes to resell international telecommunications service.

m. Not Applicable: TelNet is not affiliated with any foreign carrier on any of the routes it proposes to provide services.

n. As evidenced by the certification provided in Attachment A, TelNet has not agreed to accept special concessions directly or indirectly from any foreign carrier with respect to any U.S. international route the foreign carrier possesses sufficient market power on the foreign end of the route to affect competition adversely in the U.S. market and will not enter into such agreements in the future.

o. As evidenced by the certification provided in Attachment A, no party to this Application is subject to a denial of Federal benefits pursuant to § 5301 of the Anti-Drug Abuse Act of 1988.

p. TelNet respectfully requests streamlined processing of this Application pursuant to § 63.12 of the Commission's Rules, 47 CFR 63.12. This Application qualifies for streamlined processing for the following reasons: (1) TelNet is not affiliated with a foreign carrier on any route for which authority is sought; (2) TelNet is not affiliated with any dominant U.S. carrier whose international switched or private lines

services it seeks to resell; and (3) TelNet is not requesting authority to provide switched service over private lines to countries not previously authorized for service by the Commission.

q. The Commission's granting of this Application would serve the public interest, convenience, and necessity. The introduction of further competition into the toll and long distance markets will increase the competitive choices available to users in the state and create incentives for lower prices, more innovative services, and more responsive customer service.

WHEREFORE, TelNet respectfully requests that the Commission grant it authority to provide international telecommunications services on a facilities and resale basis pursuant to § 214 of the Communications Act of 1934, as amended.

Respectfully submitted,

TelNet Worldwide, Inc.

Date: November 24, 2003

Gary L. Field
Michael C. Rampe
LOOMIS, EWERT, PARSLEY,
DAVIS & GOTTING, P.C.
232 S. Capitol Avenue, Suite 1000
Lansing, Michigan 48933
(517) 482-2400

Attorneys for TelNet Worldwide, Inc.